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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JERONE SOTOLONGO,  
  
Defendant.

CASE NO. 2:23-CR-00308-DAD  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
  
DATE: January 16, 2024  
TIME: 9:30 a.m.  
COURT: Hon. Dale A. Drozd

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on January 16, 2024.
2. By this stipulation, defendant now moves to continue the status conference until January 30, 2024, at 9:30 a.m., and to exclude time between January 16, 2024, and January 30, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes over a hundred pages of discovery, including police reports, several body camera videos, photographs, the defendant's criminal history, and other recordings associated with the case. All of this discovery has been either produced directly to counsel and/or made available for

1 inspection and copying. The government has also sent a plea offer to the defendant, and the  
2 parties have engaged in plea discussions.

3 b) Counsel for defendant desires additional time to review the discovery, research  
4 potential issues related to the plea offer, inspect physical items seized in this case, prepare and  
5 potential file motions, and otherwise prepare for trial.

6 c) Counsel for defendant believes that failure to grant the above-requested  
7 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
8 into account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the  
11 case as requested outweigh the interest of the public and the defendant in a trial within the  
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
14 et seq., within which trial must commence, the time period of January 16, 2024 to January 30,  
15 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
16 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
17 of the Court's finding that the ends of justice served by taking such action outweigh the best  
18 interest of the public and the defendant in a speedy trial.

19 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
20 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
21 must commence.

22 IT IS SO STIPULATED.

23  
24 Dated: January 11, 2024

PHILLIP A. TALBERT  
United States Attorney

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26  
27 /s/ ROSS PEARSON  
ROSS PEARSON  
Assistant United States Attorney

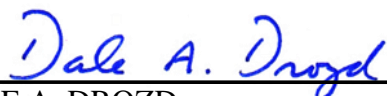
1 Dated: January 11, 2024

/s/ Douglas Beevers  
Douglas Beevers  
Counsel for Defendant  
JERONE SOTOLONGO  
(Authorized by email on January  
11, 2024)

7 **ORDER**

8 IT IS SO ORDERED.

9  
10 Dated: January 11, 2024

  
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DALE A. DROZD  
UNITED STATES DISTRICT JUDGE